



Third Periodic Review

Town Pump Station
521 East Jewett Boulevard
White Salmon Washington 98672

Facility/Site ID #: 403
Cleanup Site ID #: 4905

Completed by:
Washington State Department of Ecology
Central Regional Office
Toxics Cleanup Program

August 2020

1.0 INTRODUCTION.....	1
2.0 SUMMARY OF SITE CONDITIONS	2
2.1 Site History	2
2.2 Cleanup Levels and Point of Compliance.....	3
2.3 Site Investigations and Remedial Activities	3
3.0 PERIODIC REVIEW.....	6
3.1 Effectiveness of completed cleanup actions	6
3.1.1 Soil	6
3.1.2 Groundwater	6
3.1.3 Institutional Controls	7
3.2 New scientific information for individual hazardous substances for mixtures present at the Site	7
3.3 New applicable state and federal laws for hazardous substances present at the Site	7
3.4 Current and projected Site use	7
3.5 Availability and practicability of higher preference technologies	8
3.6 Availability of improved analytical techniques to evaluate compliance with cleanup levels	8
4.0 CONCLUSIONS.....	9
4.1 Next Review.....	9
5.0 REFERENCES.....	10
6.0 APPENDICES.....	11
6.1 Vicinity Map	12
6.2 Site Plan	13
6.3 Photo Log.....	14
6.4 Environmental Covenant	16

1.0 INTRODUCTION

This document is a review by the Washington State Department of Ecology (Ecology) of post-cleanup site conditions and monitoring data to assure human health and the environment are being protected at the Town Pump Station site (Site). Cleanup at this Site was implemented under the Model Toxics Control Act (MTCA) regulations, Chapter 173-340 Washington Administrative Code (WAC).

Cleanup activities at this Site were completed under Enforcement Order number DE 94TC-C161 that was issued on March 16, 1994. The cleanup actions resulted in residual concentrations of total petroleum hydrocarbons (TPH) exceeding MTCA Method A cleanup levels for soil that exceed MTCA Method A cleanup levels established under WAC 173-340-740(2). WAC 173-340-420(2) requires Ecology conduct a periodic review of a site every five years under the following conditions:

1. Whenever Ecology conducts a cleanup action.
2. Whenever Ecology approves a cleanup action under an order, agreed order or consent decree.
3. Or, as resources permit, whenever Ecology issues a no further action opinion
4. And one of the following conditions exists:
 - (a) Institutional controls or financial assurance are required as part of the cleanup.
 - (b) Where the cleanup level is based on a practical quantitation limit.
 - (c) Where, in Ecology's judgment, modifications to the default equations or assumptions using site-specific information would significantly increase the concentration of hazardous substances remaining at the site after cleanup or the uncertainty in the ecological evaluation or the reliability of the cleanup action is such that additional review is necessary to assure long-term protection of human health and the environment.

When evaluating whether human health and the environment are being protected, the factors Ecology shall consider include [WAC 173-340-420(4)]:

- (a) The effectiveness of ongoing or completed cleanup actions.
- (b) New scientific information for individual hazardous substances of mixtures present at the Site.
- (c) New applicable state and federal laws for hazardous substances present at the Site.
- (d) Current and projected Site use.
- (e) Availability and practicability of higher preference technologies.
- (f) The availability of improved analytical techniques to evaluate compliance with cleanup levels.

Ecology shall publish a notice of all periodic reviews in the Site Register and provide an opportunity for public comment.

2.0 SUMMARY OF SITE CONDITIONS

2.1 Site History

The Town Pump Station Site is located in the City of White Salmon in Klickitat County, Washington. The Site is located on the south side of Jewett Boulevard and is surrounded by residential properties. The topography in the area is steeply sloping to the south, and buildings on the south side of Jewett Boulevard were constructed on a flat pad, which was supported by a concrete retaining wall near the southern property boundary.

There were originally two structures at this location: a gas station on the east and a residence on the west. The Site served as an operating automotive service station until 1992. The residence was demolished between 2011 and 2016 (based on aerial photographs in Google Earth). The former gas station structure at 521 E Jewett Boulevard was recently operated as Focolare Wood Fired Pizza and is apparently now a Farmers Insurance agency office.

A single underground storage tank (UST) was located at the west end of the building and was decommissioned by removal in 1992. Soil contamination at the former service station was found, and the majority of the soil contamination was excavated in 1994.

Four other USTs were located on the north side of East Jewett Boulevard and supplied gasoline to the site by gravity feed lines. No contamination above cleanup levels was found at the USTs north of Jewett Boulevard during their decommissioning in 1996.

The former gas station property was divided into two parcels (east and west parcels) in 2007. Based on available information, soil contamination may remain on the following two parcels:

Table 1: Parcels with Remaining Soil Contamination

Parcel Number	Description	Area (acres)	Current Owner*
03111934001802	East Parcel (former gas station)	0.1	Timothy Woolsey
031119061001100	West Parcel (former residence)	0.19	Smart Development Corp.

*Based on the Klickitat County GIS web site.

South of the site was formerly a trailer park. The trailer park was demolished between 2006 and 2009, and construction of a new residential development began around 2009 and concluded around 2017. This residential development included the construction of Upper Wyers Street, which is a single lane private drive abutting the former gas station property to the south.

A vicinity map is presented in Appendix 6.1 and a Site plan is presented in Appendix 6.2.

2.2 Cleanup Levels and Point of Compliance

Enforcement Order No. DE 94TC-C161 stated that all activities shall be conducted in accordance with Washington Administrative Code 173-340. WAC 173-340-704 states that MTCA Method A may be used to establish cleanup levels at sites that have few hazardous substances, are undergoing a routine cleanup action, and where numerical standards are available for all indicator hazardous substances in the media for which the Method A cleanup level is being used.

MTCA Method A cleanup levels for unrestricted land use were determined to be appropriate for contaminants at this Site. The cleanup actions conducted at the Site were determined to be ‘routine’, few hazardous substances were found at the Site, and numerical standards were available in the MTCA Method A table for each hazardous substance.

Method A cleanup levels were modified when MTCA was modified in 2001. Because cleanup actions have not been completed at the Site, current cleanup levels are applicable. The table below indicates the changes between 1991 and 2001 MTCA Method A cleanup levels relative to the Site:

Table 2. Changes between 1991 and 2001 MTCA Method A cleanup levels

Analyte	1991 MTCA Soil Cleanup Level (mg/kg)	2001 MTCA Method A Soil Cleanup Level (mg/kg)	1991 MTCA Method A Groundwater Cleanup level (µg/L)	2001 MTCA Method A Groundwater Cleanup Level (µg/L)
TPH	NL	NL	1000	NL
TPH-Gas	100	100/30	NL	1000/800
TPH-Diesel	200	2000	NL	500
TPH-Oil	200	2000	NL	500
NL = None listed				

The extent of the Site includes the area containing soil and/or groundwater that have been impacted by the release of petroleum hydrocarbons from the Town Pump Station Site. The point of compliance for soil is defined as the area affected by petroleum hydrocarbons released from the Site into soil at concentrations above MTCA Method A cleanup levels, regardless of depth, to protect groundwater.

2.3 Site Investigations and Remedial Activities

Petroleum hydrocarbon contaminated soils (PCS) have been documented at the Site since 1989, when gasoline contaminated water was observed seeping into the trailer park located directly south and downgradient of the Site. This contaminated water was attributed to a water main break in Jewett Boulevard.

In 1992, the single UST on the property was removed and evidence of petroleum hydrocarbon (TPH) contamination was observed in soils surrounding the UST excavation. As a result of these

observations, Ecology negotiated an Agreed Order in 1992 requiring the cleanup of PCS and a Site Characterization to be performed at the Site. The property owners did not implement the actions required by the Agreed Order and an Enforcement Order was issued in 1994.

In May through June of 1994, the Enforcement Order was implemented and PCS was removed by Williams and Taylor Construction. Contaminated soil was encountered north, east, and south of the Town Pump Station building. The excavated PCS came from several distinct areas including waste oil from a broken drain line coming from the garage below the hydraulic lift; gasoline contamination from the fill pipes which entered the property from the tanks on the north side of East Jewett Boulevard; gasoline and diesel contamination between the station and the residence to the west; and gasoline contamination extending around the south side of the station toward the trailer park and retaining wall.

After excavation, PCS with concentrations exceeding MTCA Method A cleanup levels remained at the following locations:

- Beneath the former Town Pump Station building (east parcel), an estimated 60-70 cubic yards of soil primarily impacted by gasoline remained. This area also includes an unexcavated zone of 6-8 feet around the building. These impacted soils remained in place in order to maintain the structural integrity of the facility.
- Approximately 20-25 cubic yards of soil primarily impacted by gasoline remained in a strip on the downslope side of the base of the retaining wall that separated the station from the former trailer park (east parcel). This soil was left in place in order to maintain the structural integrity of the retaining wall.
- An undetermined amount of soil impacted by both gasoline and diesel remained in the front yard of the former residence to the west of the former station (west parcel). This soil was reportedly left in place due to the proximity of Jewett Boulevard and safety concerns.

Confirmation samples from the limits of the remedial excavations detected a maximum of 2,400 mg/kg of gasoline-range petroleum hydrocarbons (TPH-G) at 8.5 feet below ground surface (bgs), 5500 mg/kg of diesel-range petroleum hydrocarbons (TPH-D) at 7.5 feet bgs, and 1800 mg/kg of heavy oil-range petroleum hydrocarbons (TPH-O) at 4 feet bgs. TPH-G was detected in three samples from the excavation south of the former service station at concentrations up to 7,600 mg/kg. These soil samples were collected adjacent to the retaining wall at the south side of the Town Pump Site. Samples collected south of this excavation area did not contain contamination at concentrations exceeding MTCA Method A cleanup levels, therefore the extent of contamination appears to be limited to the east and west parcels, and not extending to parcels to the south.

Groundwater was not observed during the excavation of PCS. Excavation was conducted to a maximum depth of approximately 11 feet bgs.

In 1996, the four USTs located on the north side of East Jewett Boulevard were decommissioned by removal. The tanks consisted of four 4,000-gallon USTs. Confirmation soil samples were

collected from the sidewalls and base of the UST excavation. Sample analysis did not detect TPH at concentrations exceeding MTCA Method A cleanup levels in any of the samples.

3.0 PERIODIC REVIEW

3.1 Effectiveness of completed cleanup actions

3.1.1 Soil

As discussed above, contaminated soil may remain in three areas: on the east parcel beneath the former Town Pump Station structure and south of the former Town Pump Station structure, and on the west parcel adjacent to Jewett Boulevard.

The Town Pump Station Site continues to be occupied by a restaurant in the former service station structure. The structure continues to serve as a cap for the Site and eliminate the human exposure pathways (ingestion and direct contact) to contaminated soils. Based upon the Site visit conducted on July 23, 2020, no repair, maintenance or contingency actions have been required. A photo log is provided in Appendix 6.3.

A Restrictive Covenant for the Site was recorded on August 18, 1994. Appendix 6.4 is a copy of this Restrictive Covenant. This Restrictive Covenant states:

“In the event of demolition of the former Town Pump Building, the remaining petroleum contamination soil shall be laboratory analyzed for TPH as gasoline. If gasoline concentrations exceed cleanup levels require in the Model Toxics Control Act Cleanup Regulation, the affected soil will need to be remediated at that time.”

The Restrictive Covenant for the property is expected to ensure that remaining contamination beneath building will be cleaned up once the structure is no longer present. In the meantime, exposure to remaining contaminated soil beneath the structure will be prevented.

Cleanup actions were intended to eliminate human exposure to contaminated soils at the Site. The exposure pathway to contaminated soils (ingestion, direct contact) has been substantially reduced by the tank removals and excavation conducted during the initial cleanup, as well as the presence of the building on the Site.

3.1.2 Groundwater

No groundwater was encountered during site investigations. Petroleum contaminated water was observed seeping on the surface south of the former gas station in 1989; however, this water was attributed to a water main break in Jewett Boulevard.

The remedial excavation was completed to basalt bedrock. No confining layers were observed above the basalt bedrock. The top of the basalt bedrock was weathered and highly fractured. Therefore, no perched groundwater was expected on top of the basalt.

Domestic water production in this area is primarily from brecciated zones located between lava flows which are at a minimum of 50 feet below ground level. Domestic water service on the Site and in new development south of the Site is provided by the City of White Salmon.

Impacted soils remain at the Site at concentrations that are not protective of groundwater; however, they are not in direct contact with known water bearing zones. Contamination remaining at the Site is not likely to pose a threat to groundwater quality.

3.1.3 Institutional Controls

Ecology's current Environmental Covenant template includes the following restrictions:

1. Any activity that would threaten the containment of hazardous materials is prohibited.
2. If the structures at the Site are removed or altered, contamination remaining at the Site must be remediated.
3. The owner must give written notice to Ecology if the owner intends to convey interest in the property.
4. The owner must obtain Ecology's approval for any use of the property that is not consistent with the Restrictive Covenant.
5. The owner shall let Ecology access the property as necessary.
6. The owner may rescind the Restrictive Covenant with Ecology's consent.

Of the above restrictions, only item 2 is included within the current Restrictive Covenant. However, the current Restrictive Covenant was filed in August 1994, prior to Ecology's current Environmental Covenant template. Potential exposures to remaining contaminated soil under the current Restrictive Covenant are unlikely. Therefore, although the Restrictive Covenant is not consistent in entirety with Ecology's current practice for Environmental Covenants, change to this Restrictive Covenant does not appear to be warranted.

3.2 New scientific information for individual hazardous substances for mixtures present at the Site

There is no new scientific information for the petroleum contaminants related to the Site.

3.3 New applicable state and federal laws for hazardous substances present at the Site

Cleanup levels changed for gasoline, diesel, and volatile organic compounds as a result of modifications to MTCA in 2001; however, contamination remains at the site above MTCA Method A cleanup levels and the cleanup action is still protective of human health and the environment.

3.4 Current and projected Site use

The east parcel currently operates as an insurance agent's office. The west parcel is currently vacant. There have been no changes in current or projected future Site uses.

3.5 Availability and practicability of higher preference technologies

The remedy implemented included containment of hazardous substances and it is protective of human health and the environment. While higher preference cleanup technologies may be available, they are still not practicable at this Site.

3.6 Availability of improved analytical techniques to evaluate compliance with cleanup levels

The analytical methods used at the time of the remedial action were capable of detection below MTCA Method A cleanup levels. The presence of improved analytical techniques would not affect decisions or recommendations made for the Site.

4.0 CONCLUSIONS

- The cleanup actions completed at the Site are protective of human health and the environment.
- Soil cleanup levels have not been met at the Site; however, the cleanup action for the Property is determined to comply with cleanup standards under WAC 173-340-740(6)(f). Requirements for containment technologies have been met and the long-term integrity of the containment system (i.e. onsite structure) is provided for through institutional controls.
- The Restrictive Covenant for the property is in place and is expected to be effective in protecting public health and the environment from exposure to hazardous substances and protecting the integrity of the cleanup action.

Based on this periodic review, the Department of Ecology has determined that the requirements of the Restrictive Covenant are being satisfactorily followed. No additional remedial actions are required by the property owner. It is the property owner's responsibility to continue to inspect the Site to assure that the integrity of the cap (i.e. onsite structure) is maintained.

4.1 Next Review

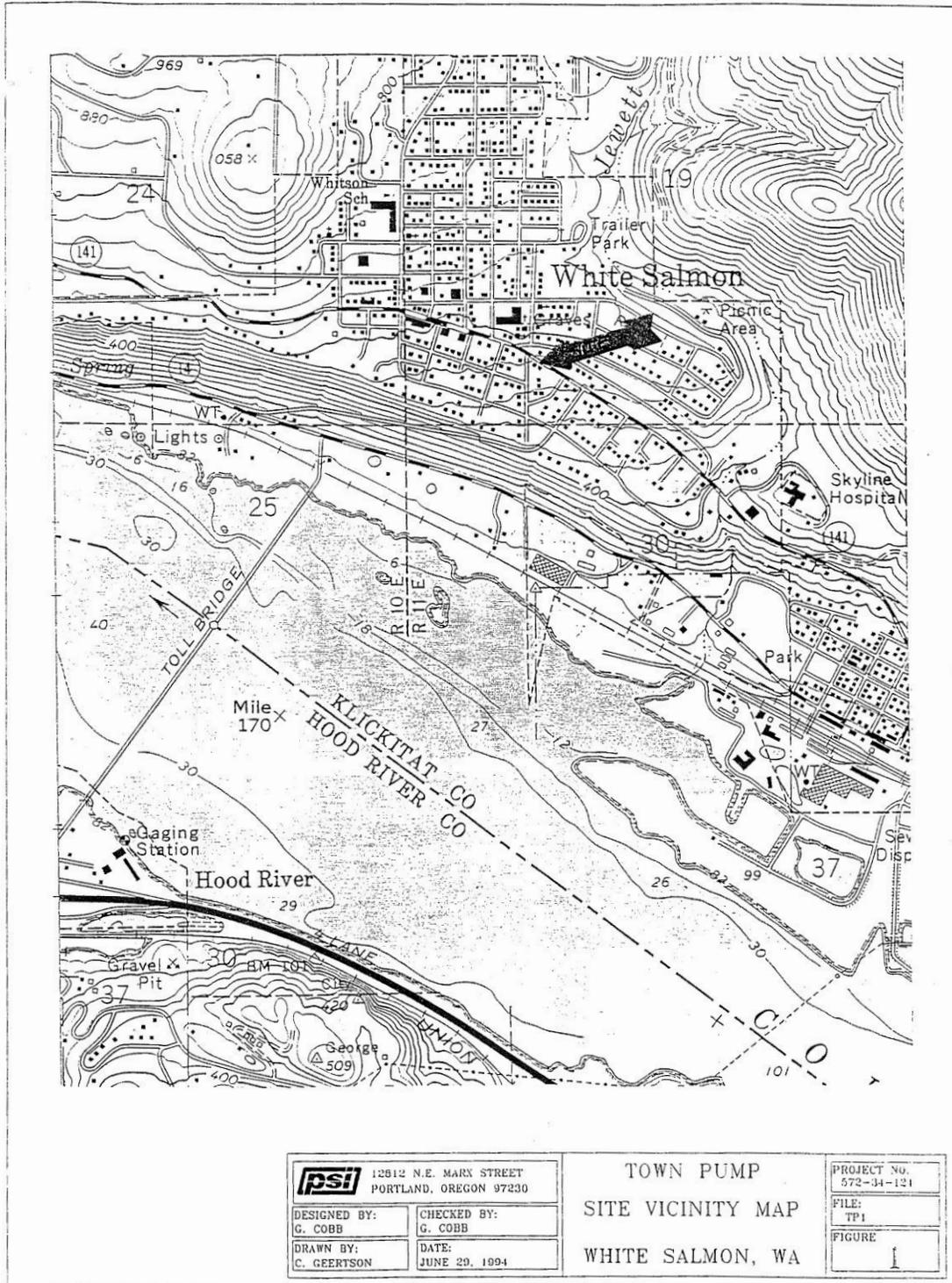
The next review for the Site will be scheduled five years from the date of this periodic review. In the event that additional cleanup actions or institutional controls are required, the next periodic review will be scheduled five years from the completion of those activities.

5.0 REFERENCES

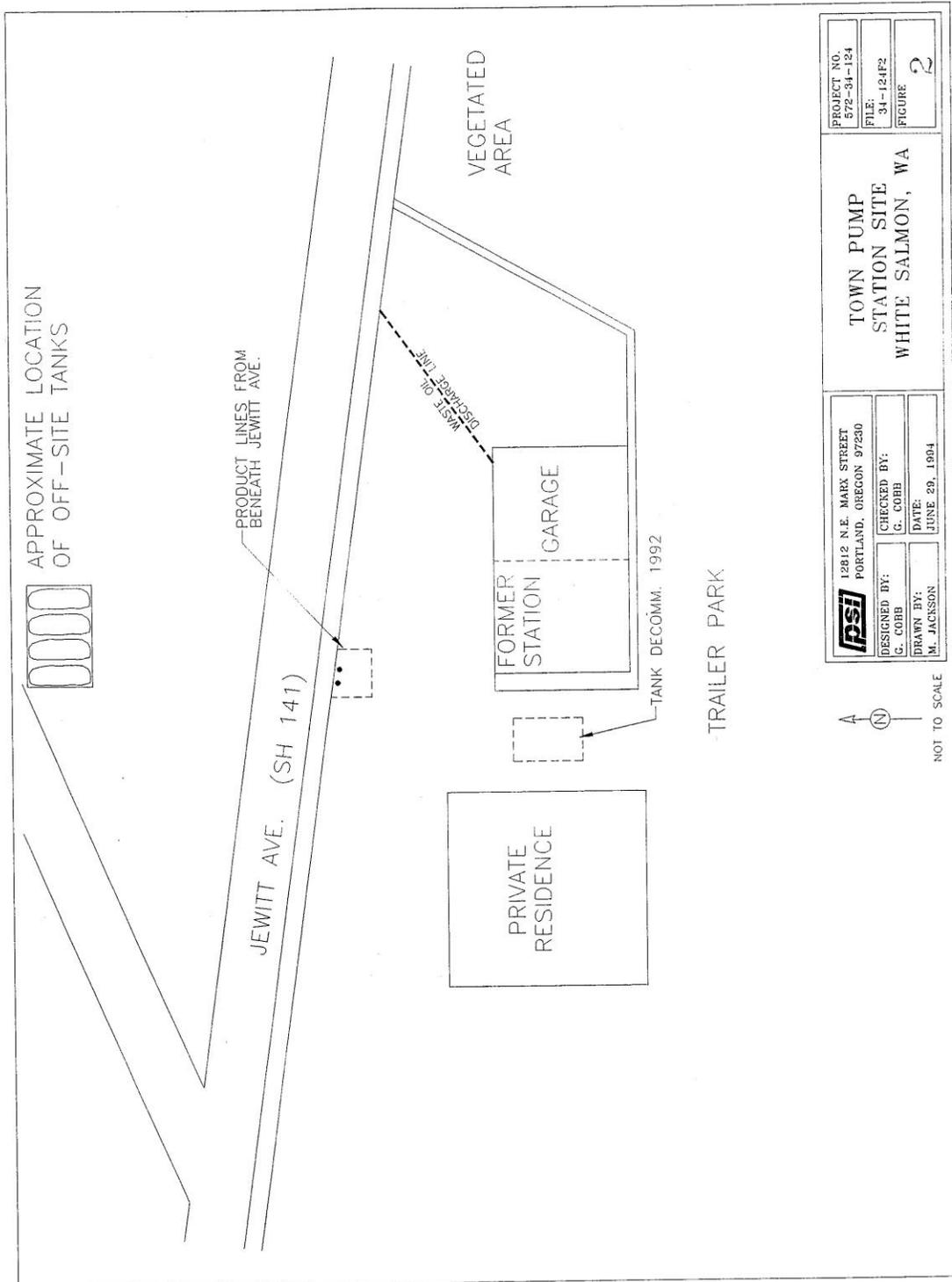
- Northwest Construction. *UST Decommissioning Summary/ Site Assessment*. April 1992.
- Williams and Taylor Construction. *Remedial Investigation/Feasibility Study*. April 1993.
- Professional Service Industries. *Work Plan for Interim Remedial Action*. April 1994.
- Professional Service Industries. *Report of Findings: Contaminated Soil Removal / Site Characterization*. July 1994.
- ESU, Inc. *Decommissioning Report for Four Underground Storage Tanks*. February 1997.
- Ecology. *Enforcement Order No. DE94TC-C161*. March 1994.
- Ecology. *Periodic Review*. September 2008.
- Ecology. *Periodic Review*. March 2014.
- Ecology. *Site Visit*. July 23, 2020.

6.0 APPENDICES

6.1 Vicinity Map



6.2 Site Plan



 12812 N.E. MARK STREET PORTLAND, OREGON 97230		PROJECT NO. 972-34-124
DESIGNED BY: C. COBB	CHECKED BY: C. COBB	FILE: 34-124F2
DRAWN BY: M. JACKSON	DATE: JUNE 29, 1994	FIGURE: 2

TOWN PUMP
STATION SITE
WHITE SALMON, WA

NOT TO SCALE

6.3 Photo Log

Photo 1: Town Pump Station Site - from the northeast



Photo 2: Downgradient Side of Site - from the southwest



Photo 3: West Side of Site - from the northwest



Photo 4: West Downgradient Side of Site – from the west



6.4 Environmental Covenant

8023

After Recording Return:
Tim's Truckee Park
PO Box 1174
Hood River OR 97031

FILED FOR RECORD
Klickitat County Auditor FILED BY YGC
RETURN TO Jim Lakerni
94 AUG 18 PM 3:15

RESTRICTIVE COVENANT

VOL. 313 | PAGE 278-279

242770

I, Kurt Osborne, being the owner of the property described on Exhibit "A" Attached hereto, do hereby agree to the following:

In the event of demolition of the former Town Pump Building, the remaining petroleum contaminated soil shall be laboratory analyzed for TPH as gasoline. If gasoline concentrations exceed cleanup levels required in the Model Toxics Control Act Cleanup Regulation, the affected soil will need to be remediated at that time.

This is intended to burden the property with said covenant, and shall be binding on future owners of the property.

Upon satisfactory review that the burdens in this covenant have been fulfilled, said Covenant shall be of no force and effect.

Jurisdiction as to the enforcement of this covenant lies with the State of Washington, Department of Ecology, or its successors.

Dated this 18th day of August, 1994


Kurt Osborne



STATE OF WASHINGTON,
County of Klickitat

On this day personally appeared before me Kurt Osborne

to me known to be the individual described to and who executed the within and foregoing instrument, and acknowledged that he signed the same as his free and voluntary act and deed, for the uses and purposes therein mentioned.

GIVEN under my hand and official seal this 18th day of August, 1994

 TAMI NYSTROM
Notary Public in and for the State of Washington,
residing at White Salmon
My appointment expires 3-12-98

ACKNOWLEDGMENT - INDIVIDUAL
FIRST AMERICAN TITLE COMPANY
WA - 48

VOL. 313 PAGE 278